

EXHIBIT I

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
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Thursday, December 13, 2018

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of JOLYNN
COLEMAN, held at 4206 South J.B. Hunt Drive,
Rogers, Arkansas, commencing at 8:15 a.m., on
the above date, before Debra A. Dibble,
Certified Court Reporter, Registered
Diplomate Reporter, Certified Realtime
Captioner, Certified Realtime Reporter and
Notary Public.

GOLKOW LITIGATION SERVICES
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deps@golkow.com

1 witness. Also with me are
2 Christine Prorok from Jones Day, and
3 Paul Morris from Walmart.

4 MR. FAIRLEY: Carter Fairley
5 for Cardinal Health.

6 MR. VO: Caley Vo on behalf of
7 McKesson.

8 THE VIDEOGRAPHER: Will counsel
9 on the phone please identify
10 themselves?

11 MS. NOWAK: Darlene Nowak from
12 Marcus & Shapira for HBC Services.

13 MR. LADD: Matthew Ladd of
14 Morgan Lewis & Bockius on behalf of
15 defendant Rite Aid.

16 MR. WATTS: Ryan Watts from
17 Arnold & Porter Kaye Scholer, LLP on
18 behalf of Endo Health Solutions Inc.,
19 Endo Pharmaceuticals Inc., Par
20 Pharmaceutical, Inc., and Par
21 Pharmaceutical Companies, Inc.

22 VIDEOGRAPHER: The court
23 reporter is Debbie Dibble. She will
24 now swear in the witness.

25 JOLYNN COLEMAN,

1 having first been duly sworn, was examined
2 and testified as follows:

3

4 DIRECT EXAMINATION

5 BY MR. ECKLUND:

6 Q. Good morning, Ms. Coleman. As
7 I introduced myself this morning, my name is
8 Don Ecklund, and I represent the plaintiffs
9 in this multidistrict litigation which is
10 currently pending in the Northern District of
11 Ohio. Moments ago you took an oath. It is
12 the same oath you would take in court.

13 Do you understand that
14 everything you say here today needs to be the
15 truth and you need to testify as completely
16 and fully as you can?

17 Do you understand that?

18 A. Yes.

19 Q. Have you ever been deposed
20 before?

21 A. Yes.

22 Q. How many times?

23 A. Twice.

24 Q. Were those in your professional
25 capacity or were those personal matters?

1 and Missouri, and in Texas.

2 Q. Okay. You graduated in 1986.
3 Have you gone back to graduate school?

4 A. I have not.

5 Q. Any certifications?

6 A. No.

7 Q. Additional training?

8 A. No.

9 Q. What did you do between 1986
10 and 1987?

11 A. I worked for K&B, which was a
12 regional chain in New Orleans, Louisiana, for
13 a year as a pharmacist.

14 Q. And how long did you stay at
15 K&B?

16 A. Right about a year.

17 Q. And what did you do then?

18 A. Moved -- transferred, and an
19 opportunity came up for a Walmart in my
20 hometown where I grew up, and I opened up a
21 pharmacy there for Walmart.

22 Q. So you joined Walmart in 1987?

23 A. Yes.

24 Q. And have you continued to work
25 for Walmart since 1987?

1 A. Yes, I have.

2 Q. You said you opened up a
3 pharmacy for Walmart.

4 Were you a dispensing
5 pharmacist?

6 A. Yes, I was.

7 Q. And how long were you a
8 dispensing pharmacist for Walmart?

9 A. Right about ten years.

10 Q. So approximately 1987 to 1997?

11 A. Approximately.

12 Q. What did you do after 1997?

13 A. Went into a market director
14 role, which was more of an oversight of
15 pharmacies across stores within a market. It
16 was about 12 to 15 stores in the central
17 Louisiana area.

18 Q. And how long were you in that
19 market director role?

20 A. About two years.

21 Q. Until 1999?

22 A. Yes.

23 Q. What position did you take in
24 1999?

25 A. I went to a general manager

1 position for our mail order pharmacy in
2 Carrollton, Texas. And I was there for
3 roughly six to seven years.

4 Q. Okay. So approximately
5 2005ish, 2006ish?

6 A. Yes.

7 Q. That's -- okay.

8 And when you left the position
9 as a general manager for the mail order
10 pharmacy group in Carrollton, Texas, what did
11 you do?

12 A. I went to the -- took an
13 opportunity to be a buyer for Walmart for Rx.
14 And stayed in that role for about six years.

15 Q. When you say you were "a buyer
16 for Walmart for Rx," do you mean you were a
17 buyer for the prescription buying group?

18 A. Yes.

19 Q. What were your responsibilities
20 as a buyer for Walmart?

21 A. My responsibilities were to
22 support the stores with inventory, work with
23 suppliers to get the best price possible on
24 the prescriptions, drugs that I purchased.
25 And just leverage relationships with those

1 suppliers to understand new products that are
2 available, and primarily support the stores
3 with the inventory they need.

4 Q. How would you leverage
5 relationships with the suppliers to
6 understand products?

7 A. Based -- if they have a new
8 launch of a product, it would be
9 understanding what the launch dates are.
10 It's a big product, what the impact might be
11 to other products in the same category.
12 Primarily to ensure that we understand the
13 volume and can support the stores with
14 inventory.

15 Q. Did your title change over time
16 from pharmacy buyer?

17 A. I moved to a senior buyer. I
18 can't recall exactly the day.

19 Q. Do you have an approximation?

20 A. It was probably my last year
21 and a half as a buyer.

22 Q. Which was when?

23 A. So I was in the role probably
24 about five years, four years, four and a half
25 years as a buyer, and then moved to a senior

1 buyer.

2 Q. Did your responsibilities
3 change when you became a senior buyer?

4 A. I don't recall a significant
5 change in what I did as a senior buyer,
6 compared to a buyer.

7 Q. Did you have a larger budget to
8 spend?

9 A. I don't recall that.

10 Q. Were you responsible for more
11 products?

12 A. I don't remember exactly what
13 changed when I moved from a buyer to a senior
14 buyer.

15 Q. Okay. So fair to say that you
16 don't recall any changes sitting here today
17 between your role and responsibility as a
18 buyer compared to a senior buyer?

19 A. Correct.

20 Q. Thank you. As someone who
21 purchased products from suppliers, what would
22 you look for in a seller?

23 What characteristics and traits
24 would you look for from a seller?

25 A. From a manufacturer?

1 Q. How did it change?

2 A. When the \$4 program launched,
3 as I had said earlier, I shifted to help with
4 generic purchases. And then, as we moved
5 into a different structure of the way we
6 bought products, we shifted to categories or
7 disease states. And then in that instance,
8 you would kind of oversee whatever drugs were
9 in that category; heart health, diabetes.

10 Q. Do you know whether the \$4
11 generic program included controlled
12 substances?

13 A. It did not.

14 Q. Do you know whether the \$9
15 program included?

16 A. To my knowledge, it did not.

17 Q. Okay. Was there a reason why
18 it wasn't included?

19 A. Just in general, in my career
20 with the company, we've never promoted
21 controlled substances to the customer or to a
22 physician.

23 Q. So the \$4 generic program was,
24 in your view, equivalent to a promotion for
25 those generic programs available at Walmart?